

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SHANIDA WRAY and NAOMI WRAY,)	
)	
Plaintiffs,)	Case No.
)	
v.)	
)	PLAINTIFFS DEMAND
AMERICAN AIRLINES, INC.,)	TRIAL BY JURY
a corporation,)	
)	
Defendant.)	

COMPLAINT

NOW COME the Plaintiffs, SHANIDA WRAY and NAOMI WRAY, and each of them, by and through their attorneys, NOLAN LAW GROUP, and complaining of the Defendant, AMERICAN AIRLINES, INC., a corporation, and state as follows:

JURISDICTION AND VENUE

1. This action seeks recovery of compensatory damages arising from bodily injuries sustained by Plaintiffs, SHANIDA WRAY and NAOMI WRAY, and each of them, due to an accident while they were passengers on board an airplane operated as American Airlines Flight 151 from Aéroport de Paris – Charles de Gaulle in Paris, France to Chicago – O’Hare International Airport, in Chicago, Illinois, on June 13, 2022.

2. Jurisdiction over this action is vested in the federal courts of the United States of America under diversity of citizenship, 28 U.S.C. §1332, in that Plaintiffs, SHANIDA WRAY and NAOMI WRAY, and each of them, are citizens of the United States of America domiciled in the State of Illinois and the Defendant, AMERICAN AIRLINES, INC., is a legal entity organized and existing under the laws of the State of Delaware, with its principal place of business in the State

of Texas and who maintains a registered agent in Cook County, Illinois.

3. Alternatively, jurisdiction over this action is vested in the federal courts of the United States of America under 28 U.S.C. §1350, in that this action arises from a treaty agreement, namely the Convention for the Unification of Certain Rules Relating to International Transportation by Air, concluded in Montreal, Canada on May 28, 1999, hereinafter referred to as the “Montreal Convention.”

INTRADISTRICT ASSIGNMENT – VENUE

4. The United States District Court for the Northern District of Illinois, Eastern Division is a proper venue for this action under 28 U.S.C. §1391 in that a substantial part of the events or omissions giving rise to this claim occurred in this District and Division.

CAUSE OF ACTION

Montreal Convention – Passenger Liability

5. On June 13, 2022, Plaintiffs, SHANIDA WRAY and NAOMI WRAY, and each of them, were and continues to be citizens of the United States of America and are citizens and residents of the State of Illinois.

6. On June 13, 2022, the Defendant, AMERICAN AIRLINES, INC., a Delaware corporation, was a commercial air carrier certified and operating in accordance with 14 CFR Part 121, and engaged in the business of carrying passengers for hire in interstate commerce.

7. On June 13, 2022, the Defendant, AMERICAN AIRLINES, INC., maintained a registered agent in the State of Illinois, County of Cook, City of Chicago.

8. On June 13, 2022, the Defendant, AMERICAN AIRLINES, INC., individually, and by and through its duly authorized agents or employees, operated, maintained and controlled a

certain aircraft, which was then and there being operated as American Airlines Flight Number 151 from Aéroport de Paris – Charles de Gaulle in Paris, France to Chicago – O’Hare International Airport, in Chicago, Illinois.

9. That on said date, Plaintiffs, SHANIDA WRAY and NAOMI WRAY, and each of them, were ticketed fare-paying passenger of the Defendant, AMERICAN AIRLINES, INC., on the aforesaid Flight 151.

11. On June 13, 2022, during the course of the flight operated as American Airlines Flight 151, an accident occurred in which American Airlines Flight 151, controlled by the Defendant, AMERICAN AIRLINES, INC., flew directly into inclement, apparent, and severe weather, resulting in severe atmospheric turbulence during which time the Plaintiffs, SHANIDA WRAY and NAOMI WRAY, and each of them, sustained whole body injuries, inclusive of head injuries.

12. That as a direct and proximate result of the aforementioned incident, Plaintiffs, SHANIDA WRAY and NAOMI WRAY, and each of them, suffered bodily injuries while passengers on board the aircraft and in the course of the flight.

13. On June 13, 2022, there was in force and effect in the United States, a certain multilateral treaty relating to the rules governing international carriage by air known as the *Convention for the Unification of Certain Rules Relating to International Transportation by Air*, concluded in Montreal, Canada on May 28, 1999, hereinafter referred to as the “Montreal Convention.”

14. At the time of his injury, Plaintiffs, SHANIDA WRAY and NAOMI WRAY, and each of them, were engaged in international carriage as defined in Article 1(2) of the Montreal

Convention, and the same is therefore applicable to this action pursuant to Article 1(1) of said Montreal Convention.

15. Pursuant to Article 17(1) of the Montreal Convention, the carrier is liable for damage sustained in the event of bodily injury suffered by a passenger, if the accident which caused the damage took place on board an aircraft.

16. That as a result of the aforesaid injuries, the Plaintiffs, SHANIDA WRAY and NAOMI WRAY, and each of them, were caused to and will in the future experience great pain and suffering, have suffered and will in the future suffer disability and disfigurement, have suffered and will in the future suffer a loss of normal life, have been caused to incur and will in the future incur expenses for necessary medical and rehabilitative care, treatment and services, have suffered and will in the future suffer a loss of the value of his time, earnings, profits and salaries, have been and will be damaged in his earning capacity, and have otherwise been damaged in a personal and pecuniary nature.

WHEREFORE the Plaintiffs, SHANIDA WRAY and NAOMI WRAY, and each of them pray that judgment be entered in their favor and against the Defendant, AMERICAN AIRLINES, INC., a corporation, for a sum in excess of seventy-five thousand dollars (\$75,000.00+), together with attorney fees, costs, and pre-judgment interest.

JURY DEMAND

Plaintiffs demand trial by jury on all issues so triable.

Dated: March 5, 2024

By: /s/ Daniel J. Nolan
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